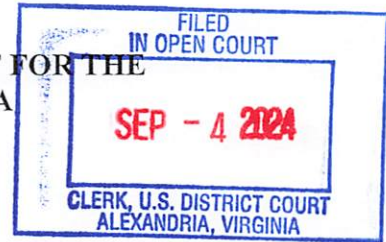


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

CARL HEINZ PIERRE,

Defendant.

Case No. 1:24-cr-173-PTG

Count 1: 18 U.S.C. § 1349
(Conspiracy to Commit Bank Fraud)

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

Count 1

(Conspiracy to Commit Bank Fraud)

1. Beginning no later than about April 2020, and continuing through at least about June 2021, in the Eastern District of Virginia and elsewhere, Defendant, CARL HEINZ PIERRE, did knowingly and intentionally combine, conspire, confederate, and agree with Raymond Rahbar, Ryan Macaulay, and other persons known and unknown to the grand jury to devise a scheme and artifice to defraud, and to obtain any monies, funds, credits, and assets owned by and under the custody and control of a financial institution by means of materially false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(All in violation of Title 18, United States Code, Section 1349.)

Forfeiture Notice

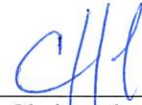
Under Federal Rule of Criminal Procedure 32.2, the defendant is hereby notified that upon conviction of the offenses charged in this Criminal Information, he shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the offense of conviction. The United States may also seek an order forfeiting substitute assets if the proceeds of the offenses are not available.

(In accordance with Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461(c).)

Respectfully Submitted,

Jessica D. Aber
United States Attorney

By: _____



Christopher J. Hood
Kristin Starr
Assistant United States Attorneys